

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

---

MOHAMMED HUSSAIN,

Plaintiff,

v.

Case No. 18-cv-529

ASCENSION SACRED HEART – ST.  
MARY'S HOSPITAL, INC.,

Defendant.

---

**DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

---

Defendant, Ascension Sacred Heart – St. Mary's Hospital, Inc. ("Defendant"), by its attorneys, Littler Mendelson, P.C., and pursuant to Rule 56 of the Federal Rules of Civil Procedure, moves the Court for an order as follows: (1) granting Defendant summary judgment on its Counterclaims against Plaintiff Dr. Mohammed Hussain (Answer to Plaintiff's Complaint, Affirmative Defenses, and Counterclaims (Dkt. #15)); and (2) granting Defendant summary judgment and dismissing Plaintiff's negligence and defamation claims against Defendant.

In support of this motion, Defendant has filed a Statement of Proposed Findings of Fact, a Memorandum of Law, and the Declaration of Dr. Michael Henry, which fully set forth the basis for their motion.

(Signature to follow on next page)

Respectfully submitted this 19th day of July, 2019.

*/s/ Casey M. Kaiser*

---

Sofija Anderson, (WI State Bar 1041498)  
Julia S. Arnold (WI State Bar 1083034)  
Casey M. Kaiser (WI State Bar 1088881)  
Littler Mendelson, P.C.  
111 East Kilbourn Avenue, Suite 1000  
Milwaukee, WI 53202  
Phone: 414-291-5536  
Fax: 414-291-5526  
Email: sanderson@littler.com  
Email: jarnold@littler.com  
Email: ckaiser@littler.com

*Counsel for Defendant, Ascension Sacred  
Heart – St. Mary's Hospital, Inc.*

FIRMWIDE:165504727.1 077095.1032